

1 Vanessa R. Waldref
2 United States Attorney
3 Eastern District of Washington
4 George J.C. Jacobs, III
5 Assistant United States Attorney
6 Post Office Box 1494
5 Spokane, WA 99210-1494
6 Telephone: (509) 353-2767

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

Case No.: 4:21-CR-06042-MKD-19

V.

FAROOQ S. YASEEN,

Motion for Detention

Defendant.

The United States moves for pretrial detention of Defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case

This case is eligible for a detention order because the case involves (check one or more):

- Crime of violence (as defined in 18 U.S.C. § 3156(a)(4) which includes any felony under Chapter 77, 109A, 110 and 117);
 - Maximum penalty of life imprisonment or death;
 - Drug offense with maximum penalty of 10 years or more;
 - Felony, with two prior convictions in above categories;
 - Felony that involves a minor victim or that involves the possession or use of a firearm or destructive device as those terms are defined in 18 U.S.C.

1 § 921, or any other dangerous weapon, or involves a failure to register under 18
2 U.S.C. § 2250;

- 3 Serious risk Defendant will flee; or
4 Serious risk obstruction of justice.

5 *See Exhibits 1-4*

6 2. Reason for Detention

7 The Court should detain Defendant because there is no condition or
8 combination of conditions which will reasonably assure (check one or both):

- 9 Defendant's appearance as required; or
10 Safety of any other person and the community.

11 3. Rebuttable Presumption.

12 The United States

- 13 will
14 will not

15 invoke the rebuttable presumption against Defendant under 18 U.S.C. § 3142(e).

16 If the United States is invoking the presumption, it applies because there is
17 probable cause to believe Defendant committed:

- 18 Drug offense with maximum penalty of 10 years or more;
19 An offense under 18 U.S.C. §§ 924(c), 956(a), or 2332b;
20 An offense under 18 U.S.C. §§ 2332b (g)(5)(B) for which a maximum
21 term of imprisonment of 10 years or more is prescribed;
22 An offense under chapter 77 of Title 18, United States Code, for
23 which a maximum term of imprisonment of 20 years or more is prescribed;
24 An offense involving a minor victim under 18 U.S.C. §§ 1201, 1591,
25 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1), 2252(a)(2), 2252(a)(3),
26 2252A(a)(1), 2252A(a)(2), 2252A(a)(3), 2252A(a)(4), 2260, 2421, 2422, 2423, or
27 2425;
28 Other circumstances as defined in 18 U.S.C. § 3142(e)(2).

4. Time for Detention Hearing

The United States requests that the Court conduct the detention hearing:

- At the first appearance, or
 - After a continuance of three days.

5. No Contact Order

The United States further requests, in addition to pretrial confinement, that Defendant be subject to the following condition:

Defendant shall have no contact whatsoever, direct or indirect, with any persons Defendant knows or reasonably should know are or may become a victim or potential witness in the subject investigation or prosecution. Prohibited forms of contact include, but are not limited to, telephone, mail, email, text, video, social media, and/or any contact through any third person or parties.

Dated: March 8, 2023.

Vanessa R. Waldref
United States Attorney

s/ George J.C. Jacobs, III
George J.C. Jacobs, III
Assistant United States Attorney

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on March 8, 2023, I electronically filed the foregoing
3 with the Clerk of the Court using the CM/ECF system, which will send notification
4 of such filing to Defendant's counsel of record, if any have been appointed or
5 retained.

6
7 s/ George J.C. Jacobs, III
8 George J.C. Jacobs, III
9 Assistant United States Attorney